

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

Ch 11 <jmp>

LEHMAN BROTHERS, ETC EL AL Case # 08-013555

Debtors

NOTICE OF MOTION AND MOTION UNDER RULE TO
ENLARGE TIME WITHIN WHICH TO FILE NOTICE OF APPEAL

SIR/MADAM:

PLEASE TAKE NOTICE THAT WILLIAM KUNTZ, III WHO
APPEAR PRO SE WILL MOVE AT A TIME AND PLACE
SET BY THE COURT UPON THE ANNEXED PAPERS FOR
AN ORDER EXTENDING HIS TIME WITHIN WHICH TO FILE A
NOTICE OF APPEAL FROM AN ORDER DATED OCT 16, 2008.

PLEASE TAKE NOTICE THAT THE COURT MAY RULE UPON
THE MOTION WITH OR WITHOUT A HEARING AND WITH OR
WITHOUT PAPERS IN OPPOSITION.

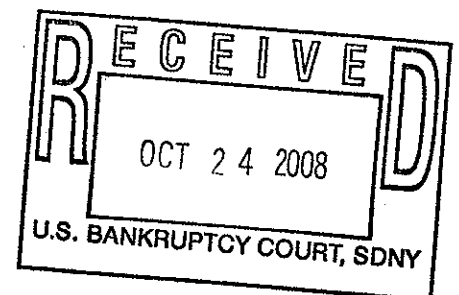
 RESPECTFULLY,

WILLIAM KUNTZ, III INDIA ST PO BOX 1801

NANTUCKET ISLAND, MA 02554-1801

508-775-5225

OCT 23, 2008



UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

Ch 11 <jmp>

LEHMAN BROTHERS, ETC EL AL Case # 08-013555

Debtors MOTION TO EXTEND TIME

Now comes William Kuntz, III who appears Pro Se and Respectfully submits the following:

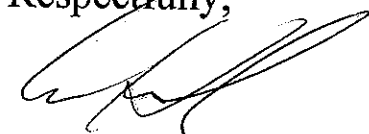
By Order dated Oct 16, 2008 this Court denied Movant's attempt to reach a certain Escrow Account. The Order stated that it was denied "with Prejudice". On Oct 22, 2008 Federal Express<ex 1> delivered Movant's Motion in NY for Reconsideration to remove the "with Prejudice" language included in the Order supplied by Weil, Gotshal.

Assuming this is considered within the next few days, Movant Wishes to preserve his right to appeal but does not wish to incur the expense of a Fee or further Crowd the docket of District Court. Movant really has no desire to either be stuck to the tar-baby of Lehman or further tarred and feathered by obtuse¹ papers from the Debtors Counsel seeking to further it's agenda rather than restoring property to the rightful owners/claimants.

¹ As in the Silicon Graphics Case, it is almost pathetic that Weil, Gotshal, who was the Ch 11 Counsel Could not distinguish between Cray Reseach and Cray Computers, both founded by Seymour Cray but with Different corporate existences and Movant's ownership in the latter instead of alleging Movant owned Stock in the former as presented to Judge Lifland

However, given the fact that Weil, Gotshal served as Counsel to the Debtor of Grand Union III before Judge Winfield In New Jersey at a time when it clearly also represented this Debtor cannot be ignored by this Court and makes the strenuous Objections suspect. When the Transcripts of Grand Union become Available Movant and as Movant recalls certain statements being made In open court when Attorney Basta formerly of Weil, Gotshal was present movant might wish to seek the Court's review of this matter unfettered by the "with prejudice" and in advance of the Claims Process which may take a Decade. Accordingly Movant requests that the Court grant an extension within which to file a Notice of Appeal.

Respectfully,



William Kuntz, III

India St PO Box 1801

Nantucket Island, Ma 02554-1801

508-775-5225

FedEx | Track

Page 1 of 1



Español | Customer Support | FedEx Locations Search

Go

Package/Envelope

Freight

Expedited

Office/Print Services *

Ship ▶

Track ▶

Manage ▶

Business Solutions ▶

Track Shipments/FedEx Kinko's Orders
Detailed Results

Printable Version
 Quick Help

Tracking number 864121881503
 Signed for by K.CAPPIELLO
 Ship date Oct 20, 2008
 Delivery date Oct 22, 2008 8:52 AM
 Status Delivered
 Signature image available Yes

Delivered to
 Service type
 Weight

Receptionist/Front Desk
 Express Saver Pak
 2.0 lbs.

Wrong Address?
 Reduce future mistakes by using
 FedEx Address Checker.

Tracking a FedEx SmartPost
 Shipment?
 Go to shipper login

Date/Time	Activity	Location	Details
Oct 22, 2008	8:52 AM Delivered		
	8:23 AM On FedEx vehicle for delivery	NEW YORK, NY	
	8:06 AM At local FedEx facility	NEW YORK, NY	
	5:52 AM Arrived at FedEx location	NEWARK, NJ	
	3:21 AM Departed FedEx location	MEMPHIS, TN	
Oct 21, 2008	11:27 AM Arrived at FedEx location	MEMPHIS, TN	
Oct 20, 2008	11:27 PM At local FedEx facility	EAST BOSTON, MA	
	7:23 PM Left FedEx origin facility	WEST YARMOUTH, MA	
	12:20 PM Picked up	HYANNIS, MA	Tendered at FedEx Kinko's location



Signature proof

E-mail results

Track more shipments/orders

Subscribe to tracking updates (optional)

Your name: Your e-mail address:

E-mail address	Language	Exception updates	Delivery updates
<input type="text"/>	English	<input type="checkbox"/>	<input type="checkbox"/>
<input type="text"/>	English	<input type="checkbox"/>	<input type="checkbox"/>
<input type="text"/>	English	<input type="checkbox"/>	<input type="checkbox"/>
<input type="text"/>	English	<input type="checkbox"/>	<input type="checkbox"/>

Select format: ☒ HTML ☐ Text ☐ Wireless

Add personal message:

Not available for Wireless or non-English characters.

☐ By selecting this check box and the Submit button, I agree to these Terms and Conditions

Submit